Equality, Diversity & Inclusion Strategy
April 2017 – March 2020
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Our commitment to equality, diversity and inclusion

The General Optical Council (GOC) is the statutory regulator for the optical professions in the UK. We are committed to ensuring that in exercising all of our functions we operate in a fair and transparent manner and in a way that is free from discrimination, harassment and victimisation.

Within all of our functions, we are committed to promoting equality; valuing diversity; being inclusive; and meeting our equality duties.

- **Promoting equality**
  - We operate in a principled, fair and transparent manner and in a way that is free from discrimination, harassment and victimisation. We aim to promote, celebrate and utilise the benefits of diversity and equality in all of our activities. This includes engaging fairly and equally with members of the public, registrants, current and prospective members and employees.

- **Valuing diversity**
  - We value the differences which exist between people, the differences that extend well beyond protected characteristics. Valuing difference enables us to be innovative; inclusive and well-rounded and sustain an environment where everyone is valued, respected and included.

- **Being inclusive**
  - We firmly believe that we will achieve and deliver more by working collaboratively and supporting individuals’ needs. As a regulator, public service provider and employer, we aim to ensure the full and fair participation of vulnerable or under-represented groups.
  - We strive to eliminate any adverse impacts from our activities for everyone and can only truly do this with representative feedback and diverse input.

- **Meeting our equality duties**
  - We are committed to delivering on all of our equality duties. We will make clear, well-reasoned, evidence-based decisions and will always be open and transparent in our justification when taking positive action to overcome the disadvantages experienced by some groups.
  - We will provide reasonable adjustments when requested and aim to use learning from these to improve our services and solutions.
Our equality duties

Under the Equality Act 2010 (the Act) we have a number of duties that we must carry out and exercise within our public functions. The Act provides protection for people against discrimination (both direct and indirect) on the basis of nine protected characteristics: age; disability; gender reassignment; race/ethnicity; religion or belief; gender; sexual orientation; marriage and civil partnership; and pregnancy and maternity. It also provides for positive action to advantage some disadvantaged groups.

As a public body, we must have due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Tackle prejudice and promote understanding between people who share a protected characteristic and those that do not
- Remove or minimise disadvantages and barriers experienced by people due to their protected characteristics
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people, including providing reasonable adjustments as appropriate
- Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not
- Encourage the participation of people with disabilities in public life or in other activities, particularly where their participation is disproportionately low

Examples of how we apply these duties:

- We consider all requests for reasonable adjustments to enable members of the public with disabilities to attend our public Council meetings;
- We consult with a wide variety of people and groups to seek well-rounded feedback which represents the different needs of diverse groups; and
- We monitor our recruitment processes to identify any potential barriers for individuals with disabilities to be successful candidates.
Our expectations

We expect all those who exercise our functions (including our employees, members and third parties acting on our behalf) to be aware of and to comply with the Act’s duties in practice, including when advising on or making decisions about our policies and practices.

Our approach to embedding equality

Equality, Diversity and Inclusion (EDI) is embedded within our planning and reporting frameworks. We demonstrate our compliance with the Act through our:

- **GOC Strategy:** Sets out our strategic objectives for a 3 year period
- **EDI Strategy:** Details our specific EDI objectives for a 3 year period, which links to the GOC Strategy
- **Business Plan:** Sets out our main actions for the year to achieve our objectives in both the GOC and EDI Strategy
- **Annual Report:** Details progress in relation to our strategic objectives
- **Annual EDI monitoring report:** Details progress in relation to our EDI activities
- **EDI action plan:** Plan of actions underpinning the main business plan actions

Additional reporting

We are required (by section 32A(1) of the Opticians Act) to include information in our Annual Report regarding the arrangements we have put in place to ensure that we adhere to good practice regarding equality and diversity. The Annual Report is submitted to the Charities Commission and Privy Council and laid before Parliament.
Strategic development

Our EDI strategy sets out how we fulfil our responsibility to promote EDI in carrying out our role as regulator for the optical professions in the UK. It brings together all the activities we are carrying out to ensure that we fulfil our EDI duties, review our performance annually, report on progress and revise as appropriate. The Chair of the GOC, Gareth Hadley, is our non-executive champion and Vicky McDermott, Chief Executive and Registrar, leads this area on behalf of the Executive. Our champions take an active part in ensuring that the strategy is developed in line with our duties and capabilities and is implemented effectively.

We have developed this strategy's objectives by considering three main themes:

• completing a review of our previous EDI scheme 2014–17;
• conducting internal and external consultation; and
• considering findings in our own research and reports and those of other organisations.

Evaluation of previous EDI scheme 2014–17

We considered the progress made in achieving the objectives set out in our 2014–17 scheme. Our previous EDI objectives were:

1. Our policies and procedures
2. Our guidance and training
3. Monitoring and impact
4. Access
5. Communication and engagement
6. Service delivery
7. Action planning
We found that we had made good progress across all areas. Key actions include:

<table>
<thead>
<tr>
<th>Completed action</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Created a EDI action plan to record actions, including those identified through our impact assessment process</td>
<td>We monitor how effective we are in progressing EDI actions that are identified and agreed through our impact assessment process</td>
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<tr>
<td>Reviewed and launched an impact assessment process and implemented actions identified in a timely manner</td>
<td>More employees are considering EDI within their role and decisions are being taken following consideration of EDI impacts</td>
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<tr>
<td>Successfully moved to a new office</td>
<td>We work in a more accessible working environment which has improved internal communication</td>
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<tr>
<td>Standardised our ‘approach to EDI monitoring’</td>
<td>We improved how we record monitoring information and clarified its purpose</td>
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<td>Delivered equality and unconscious bias training for employees and members</td>
<td>Our EDI awareness is up-to-date and is considered within different roles</td>
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<tr>
<td>Signed up to the Equality and Human Rights Commission’s ‘Working Forward’ campaign which aims to promote the rights for pregnancy and maternity in the workplace</td>
<td>We demonstrated our commitment to reduce barriers at work for working families</td>
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<tr>
<td>Implemented a translation and interpretation service</td>
<td>We can facilitate communication in over 100 languages, including Welsh, as required</td>
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<tr>
<td>Engaged with external stakeholders to monitor any changes in the EDI landscape</td>
<td>We ensured that our EDI activities remain current</td>
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<tr>
<td>Evaluated our current and planned activity against the standards expected of a public body with regard to the Public Sector Equality Duty</td>
<td>We are compliant with relevant EDI legislation</td>
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<tr>
<td>Published our annual EDI monitoring report, detailing our progress</td>
<td>We started to identify areas where further research is required</td>
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We include a full evaluation of our progress against our objectives within our annual EDI monitoring report\(^1\), which identifies a number of themes that continue into our next strategy, specifically: communication and engagement; monitoring and impact analysis; and service delivery.

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Internal stakeholder engagement

When considering our Strategic plan and EDI strategy, we engage with employees and members. We conduct regular staff surveys, seek feedback on policies and the application of policies and use our staff engagement group to understand the common view – including on matters related to EDI and our ways of working.

We ask for views regarding how to ensure we deliver our service in a way that considers:

- our role and remit as a regulator and employer;
- the type of regulator we are, what we do well, what we do less well;
- who our stakeholders are and how we engage with them to achieve our objectives;
- where we are in achieving our current EDI objectives;
- what is most important for us to focus on next; and
- how we must behave to ensure EDI is truly embedded within our work.

We also use the feedback we receive to update our EDI action plan and consider individual and group learning needs to develop our training programme.

We received encouraging feedback from employees regarding our proposed EDI strategy and objectives. Through doing so, employees explained how they try to consider EDI within their work and the process contributed to raising awareness about the strategy and objectives internally, increasing engagement.

External stakeholder engagement

We are active members of a healthcare regulators’ Equality and Diversity group, the UKIED and the Equality and Human Rights Commission’s Regulators, Inspectorates and Ombudsman forum, within which we share best practice and input regarding our EDI activities. We also attend a number of external events focused on a range of equality and diversity topics – including a changing legislative landscape, mental health awareness and transgender policy. We have taken learning from this into account in order to develop the EDI strategy.

We look to increase our engagement with stakeholders and representative groups and further expand our network by identifying and engaging with under-represented groups to ensure that their needs are considered within our service delivery. We want to hear from diverse groups who endeavor to reflect the public’s perspective and who have an interest in eyecare.

The consultation on our draft Strategic Plan 2017–20 has informed the development of this EDI strategy, with the following consultation comments being highlighted:

- a desire for greater consideration to ensuring better ocular/optical outcomes for people with learning disabilities;
- that we consider how to engage with people whose first language is not English;
- that we do more to ensure registrants and optical practices are aware of their obligations to provide reasonable adjustments, which include accessible information; and
- that accessible services are essential to improve public confidence in the profession and build an understanding of the role of optical professionals.
The feedback from our consultation on this EDI strategy included three key themes:

- it is good that the EDI objectives are linked with the organisational strategic objectives;
- further outcomes should be included within the Learning and Development objectives; and
- stakeholders are keen to be involved. EDI is important to them and how they work, and also how they want the sector to incorporate this essential practice, with Education as a significant cornerstone.

Following this feedback we have retained the structure of our strategy, amended our outcomes for Learning and Development and are looking to develop our stakeholder networks.

**Research and analysis**

It is important for us to carry out research and take account of external developments to inform our approach towards EDI. We continue to develop our areas of research and consider EDI within the design and analysis of our research.

We conducted a suite of employee engagement surveys and have a staff engagement group to identify internal areas that we need to further review which have been considered within our new objectives.

We also conducted a public perceptions survey and a registrant survey, produced an annual EDI monitoring report and have considered where there have been findings specific to EDI. For example, within our 2015/16 annual monitoring report, one area highlighted was our member recruitment process. Our processes appear to be fair for all individuals throughout the application, longlisting and shortlisting stages, but we recognise the need to continue to strive to attract a more diverse candidate base at application stage. For registrant member positions, we especially need to explore how to attract more female candidates to reflect the registrant demographic. It is important that we continue to focus on this to ensure that we make well-rounded decisions in all of our regulatory functions.

We have considered a number of recent reports from leading organisations, such as SeeAbility’s *Delivering an equal right to sight* which found that adults with a learning disability are ten times more likely to have a serious sight problem than other adults. We also must consider the impact of NHS England’s Accessible Information Standard (also known as SCCI 1605), which are specific requirements regarding how services are delivered and information is provided for individuals who have specific accessibility needs as well as requirements across the rest of the United Kingdom.

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4 Both reports are available here: https://www.optical.org/en/news_publications/Publications/policy-and-research-papers.cfm
Our EDI objectives

This strategy details our three year EDI objectives, which sit within the GOC mission, vision and strategic objectives – as shown below.

**GOC Mission**
To protect and promote the health and safety of the public

**GOC Vision**
Optical professionals are equipped for the roles of the future, our regulation is targeted at risks to the public’s health and safety and we are an organisation that is accessible and easy to work with

**Learning and development of optical professionals**
Deliver a strategic review of optical education and training and implement changes to ensure that optical professionals are equipped for future roles

**Targeted approach to regulation**
Build our evidence base and use the full range of our regulatory levers in a proportionate way to address risks to the public

**Organisational transformation**
Deliver high quality, efficient services to the public and registrants underpinned by a culture of evaluation and continuous improvement

**Strategic Objectives**

**Equality, Diversity and Inclusion Objectives**

To ensure registrants are able to deliver an effective service tailored to their patients’ needs, being aware of their EDI responsibilities

To build our EDI evidence base and understand the impact of our regulatory activity on diverse groups

To ensure EDI impacts are taken into account in our internal processes and in how we deliver services to the public and registrants
Learning and development of optical professionals

**Strategic objective**
- To deliver a strategic review of optical education and training and implement changes to ensure that optical professionals are equipped for future roles

**EDI objective**
- To ensure registrants are able to deliver an effective service tailored to their patients’ needs, being aware of their EDI responsibilities

**Example actions**
- We complete impact assessments within our project work and ensure arising actions are undertaken
- We continue to promote our expectations of EDI awareness and behaviour through our standards of competence

**Desired outcomes**
- Newly qualified and current registrants understand their EDI responsibilities, including the NHSE Accessible Information Standard as appropriate, and embed this within their daily work
- Educational and representative bodies are aware of their EDI responsibilities, the importance and the benefits of EDI awareness in the profession and ensure that this is a theme at the forefront of registrant training
Targeted approach to regulation

**Strategic objective**

- To build our evidence base and use the full range of our regulatory levers in a proportionate way to address risks to the public

**EDI objective**

- To build our EDI evidence base and understand the impact of our regulatory activity on diverse groups

**Example actions**

- We continue to undertake and report on EDI monitoring activity
- We complete impact assessments within our project work and ensure arising actions are undertaken
- We engage with external stakeholders to monitor any changes in EDI landscape, and proactively seek the views of seldom heard groups

**Desired outcomes**

- Our research, consultations and decision-making takes into account differences across diverse groups, where appropriate
- EDI responsibilities are reflected in the standards of practice for individual registrants and business standards
- We have a wide and diverse audience with whom we consult and engage
Organisational transformation

**Strategic objective**

- To deliver high quality, efficient services to the public and registrants underpinned by a culture of evaluation and continuous improvement

**EDI objective**

- To ensure EDI impacts are taken into account in our internal processes and in how we deliver services to the public and registrants

**Example actions**

- We complete impact assessments on our policies and processes and ensure required actions are undertaken
- We continue to promote our expectations of EDI awareness and behaviour through our code of conduct and induction
- We run training on EDI awareness and unconscious bias in decision-making for employees and members

**Desired outcomes**

- Customer service is continuously improved, tailored to the reasonable needs of the customer, and delivered in a timely manner
- We have improved and simplified policies and processes which are fair, transparent and applied consistently – with their impacts on different groups monitored and reviewed as appropriate
- We consider EDI impacts of our projects and work to ensure any changes in process are consistent and fair
- Our employees and members are aware of their EDI responsibilities and consider them within their role
- We have an inclusive workplace which celebrates talent, is free from discrimination, and ensures fair treatment for all